

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LEADENHALL CAPITAL PARTNERS LLP
and LEADENHALL LIFE INSURANCE
LINKED INVESTMENTS FUND PLC,

Plaintiffs,

v.

JOSH WANDER, STEVEN PASKO,
KENNETH KING, 777 PARTNERS LLC, 600
PARTNERS LLC, SPLCSS III LLC, SIGNAL
SML 4 LLC, INSURETY AGENCY
SERVICES LLC, DORCHESTER
RECEIVABLES II LLC, SUTTONPARK
CAPITAL LLC, SIGNAL MEDICAL
RECEIVABLES LLC, INSURETY CAPITAL
LLC, SUTTONPARK SERVICING LLC, and
ADVANTAGE CAPITAL HOLDINGS LLC,

Defendants.

Civil Action No. 1:24-cv-03453 (JGK)

DECLARATION OF JONATHAN M. WATKINS

I, Jonathan M. Watkins, hereby declare as follows:

1. I am an attorney at Cadwalader, Wickersham & Taft LLP and counsel for Advantage Capital Holdings LLC and Kenneth King (collectively, “A-CAP Defendants”) in this matter.
2. I submit this Declaration in support of A-CAP Defendants’ Letter Motion to the Court to formally seal portions of Plaintiffs’ Reply in Support of Leadenhall’s Motion for Contempt, filed on May 27, 2025, ECF 320 (under seal), 321 (publicly redacted).
3. Attached hereto as Exhibit A is a redacted (but otherwise true and correct) copy of a May 27, 2025 email exchange between counsel for A-CAP and counsel for Leadenhall. Certain confidential information is redacted from Exhibit A.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 30, 2025

/s/ *Jonathan M. Watkins*
Jonathan M. Watkins